

COHN LIFLAND PEARLMAN
HERRMANN & KNOFF LLP
PETER S. PEARLMAN
JEFFREY W. HERRMANN
Park 80 Plaza West-One
Saddle Brook, NJ 07663
Telephone: 201/845-9600
201/845-9423 (fax)

Liaison Counsel

ROBBINS GELLER RUDMAN
& DOWD LLP
ARTHUR C. LEAHY
THEODORE J. PINTAR
JEFFREY D. LIGHT
SHANNON M. MATERA
FRANCIS A. DIGIACCO
655 West Broadway, Suite 1900
San Diego, CA 92101
Telephone: 619/231-1058
619/231-7423 (fax)

Lead Counsel for Plaintiffs

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

HOWARD CHARATZ, Individually)	No. 3:05-cv-02319-MLC-TJB
and On Behalf of All Others Similarly)	(Consolidated)
Situated,)	
)	<u>CLASS ACTION</u>
Plaintiff,)	
vs.)	DATE: September 27, 2010
)	TIME: 1:00 p.m.
AVAYA, INC., et al.,)	COURTROOM: The Honorable
Defendants.)	Mary L. Cooper

DECLARATION OF JEFFREY D. LIGHT FILED ON BEHALF OF ROBBINS
GELLER RUDMAN & DOWD LLP IN SUPPORT OF APPLICATION FOR
AWARD OF ATTORNEYS' FEES AND EXPENSES

I, JEFFREY D. LIGHT, declare as follows:

1. I am a member of the firm of Robbins Geller Rudman & Dowd LLP. I am submitting this declaration in support of my firm's application for an award of attorneys' fees and expenses in connection with services rendered in the above-entitled action.

2. This firm is counsel of record for Lead Plaintiffs, District No. 9, I.A. of M. & A.W. Pension Trust, UFCW Local 880 – Retail Food Employees Joint Pension Fund, UFCW Local 880 Union-Employer Pension Fund, National Elevator Industry Pension Fund, and City of Livonia Employees' Retirement System.

3. The identification and background of my firm and its partners is attached hereto as Exhibit A.

4. The total number of hours spent on this litigation by my firm is 2,013.10. The total lodestar amount for attorney/paraprofessional time based on the firm's current rates is \$1,064,994.50. The hourly rates shown below are the usual and customary rates charged for each individual in all of our cases. A breakdown of the lodestar is as follows:

<i>NAME</i>		<i>HOURS</i>	<i>RATE</i>	<i>LODESTAR</i>
Daley, Joseph D.	(P)	10.75	605	6,503.75
Leahy, Arthur C.	(P)	366.75	675	247,556.25
Light, Jeffrey D.	(P)	43.50	665	28,927.50
Pintar, Theodore J.	(P)	41.50	700	29,050.00
Rosenfeld, David	(P)	24.25	575	13,943.75
Svetcov, Sandy	(P)	413.75	775	320,656.25
Alba, Mario	(A)	16.25	495	8,043.75

<i>NAME</i>		<i>HOURS</i>	<i>RATE</i>	<i>LODESTAR</i>
Bowie, Gavin M.	(A)	123.50	410	50,635.00
Digiacco, Francis	(A)	105.60	295	31,152.00
Kerkhoff, Lauren G.	(A)	164.50	445	73,202.50
Matera, Shannon	(A)	85.75	475	40,731.25
Siben, Matthew P.	(A)	229.50	460	105,570.00
Torres, Carolina	(A)	17.25	380	6,555.00
Paralegal I		289.25	220-295	84,417.50
Paralegal II		3.50	256-280	950.00
Paralegal III		77.50	190-285	17,100.00
<i>TOTAL</i>		<i>2,013.10</i>		<i>\$1,064,994.50</i>

(P) Partner

(A) Associate

5. My firm incurred a total of \$175,611.59 in expenses in connection with the prosecution of this litigation. They are broken down as follows:

EXPENSES

From Inception to June 30, 2010

<i>EXPENSE CATEGORY</i>	<i>TOTAL</i>
Meals, Hotels & Transportation	\$ 12,607.27
Photocopies	9,627.67
Postage	324.39
Telephone, Facsimile	81.00
Messenger, Overnight Delivery	1,504.61
Filing, Witness & Other Fees	1,589.00
Court Reporters	610.00
Lexis, Westlaw, Online Library Research	7,263.74
Class Action Notices/Business Wire	1,060.00
Experts/Consultants/Investigators	140,943.91
Outside:	
Financial Markets Analysis LLC	18,337.50
L.R. Hodges & Associates, Ltd.	73,996.41
Lily Haggerty	1,920.00

In-House:		
Graphics Assistant	6,300.00	
Economic/Damage Analyst	36,190.00	
Investigators	4,200.00	
TOTAL		\$ 175,611.59

6. The following is additional information regarding these expenses:

(a) Photocopying:

In-house (32,632 copies @ \$0.25 per copy): \$8,158.00

Outside Photocopy Expenses: \$1,469.67

DATE	VENDOR
02/21/07	Ikon Document Services
05/03/07	Ikon Document Services

(b) Filing, Witness and Other Fees: \$1,589.00

DATE	VENDOR
05/12/05	Courthouse News Service
09/16/05	Clerk, U.S. District Court
01/23/06	New Jersey Lawyer's Fund
02/27/06	Clerk, U.S. District Court
11/17/09	Clerk, U.S. District Court
01/05/10	Clerk, U.S. District Court
01/05/10	New Jersey Lawyer's Fund

(c) The firm incurred expenses of \$610.00 for amounts paid to court reporters for transcripts of court hearings and depositions.

DATE	VENDOR
03/18/08	James Decrescenzo Reporting, LLC

(d) Meals, Hotels and Transportation: \$12,607.27. Expenses for out-of-town meals, hotels and transportation were incurred for the following purposes:

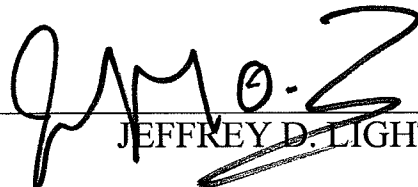
NAME	DATE	DESTINATION	PURPOSE
Rosenfeld, David	08/01/05	Trenton, NJ	Attend oral argument on lead plaintiff motion

Siben, Matthew	08/10/06- 08/14/06	Trenton, NU	Prepare for and attend oral argument
Leahy, Arthur	08/13/06- 08/14/06	Trenton, NJ	Prepare for and attend hearing
Svetcov, Sanford	03/02/08- 03/03/08	Philadelphia, PA	Review oral argument outline; present oral argument in 3rd Circuit
Leahy, Arthur	03/02/08- 03/04/08	Philadelphia, PA	Prepare for and attend hearing
Leahy, Arthur	11/18/09- 11/19/09	Trenton, NJ	Prepare for and attend status conference

(e) Lexis, Westlaw, Online Library Research: \$7,263.74. These included vendors such as Disclosure, Inc., Dow Jones Interactive, Dow Jones & Co., Inc., Lexis Nexis, CDA Investment Technologies, Pacer Service Center, West Publishing Corporation, and Choice Point. These databases were used to obtain access to SEC filings, legal research and cite-checking of briefs. The charges for these vendors vary depending upon the type of services requested.

7. The expenses pertaining to this case are reflected in the books and records of this firm. These books and records are prepared from expense vouchers, check records and other documents and are an accurate record of the expenses.

I declare under penalty of perjury that the foregoing is true and correct.
Executed this 12th day of July, 2010, at San Diego, California.


JEFFREY D. LIGHT